

Reference 40

Texas Department of Water Resources

INTEROFFICE MEMORANDUM

TO : Gary Schroeder, Chief, Solid Waste and Spill
Response, Enforcement and Field Operations

DATE: February 25, 1982

THRU :

FROM : John Bolders, District 12

SUBJECT: Uni Refining, Inc., Solid Waste Registration 31288

On February 9, 1982 Russell Lewis and I conducted an annual solid waste compliance inspection at the subject facility. Uni is a crude oil "topping" facility with a production capacity of 40,000 barrels per day. Their primary products are naphtha, jet fuel, diesel and fuel oil. Actual production has been erratic dependent on the availability of low sulphur crude oil and product market condition. The facility was not operating during the inspection; last production occurred during November and December 1981. Rich Thompson, refinery manager, accompanied us during the inspection. The following areas of non-compliance were noted:

- 1) The Notice of Registration (annotated registration attached) was not current. Violation of TDWR Rule 156.22.01.106. The following changes should be made:
 - a. change person in charge to Rich Thompson,
 - b. change phone number to (512) 776-2537,
 - c. change disposition of waste 01 to off-site,
 - d. change disposition of waste 02 to off-site/sold for recovery,
 - e. change disposition of waste 03 to on-site,
 - f. add oil contaminated dirt disposed on-site,
 - g. add API separator sludge disposed off-site, *
 - h. add waste pile for disposal of waste 03 and "f" above to Part III of Registration.
- 2) Company has not completed a hazardous waste determination for waste 01, spent caustic. Violation of TDWR Rule 156.22.06.002.

The company is non-compliant with TDWR Rules 156.22.05 thru .23 and .27 (as applicable) if the spent caustic, waste 01, stored in a 300 barrel tank on-site, is hazardous. The only other hazardous waste, API separator sludge, is generated infrequently in small quantities. Pending a hazardous waste determination of waste 01, the company plans to seek a small quantity generator exclusion (TDWR Rule 156.22.06.001) and, if necessary, institute on-site neutralization of the spent caustic.

- * The company has stored small quantities of API separator sludge on-site inside a tank farm fire wall. When informed of the requirements for on-site disposal facilities, Thompson indicated that all stored API separator sludge would be removed off-site for disposal and all future sludge production would be disposed off-site.

JB:cb

Attachment

Signed

Carlton Stanley for John Bolders

Approved

Paul Kutchinski

40001

TABLE OF CONTENTS

1. Non-Major Checklist
2. Tanks Checklist
3. Annotated Registration
4. Facility Sketch
5. Rules Cited by Report

TEXAS DEPARTMENT OF WATER RESOURCES
Industrial Solid Waste Disposal Compliance Monitoring Inspection

Inspection Cover Sheet (see reverse side for checklist use and general instructions)

Compliant

Texas Permit/Reg. No. 31288

Noncompliant ✓ (explain by separate memo)

EPA I.D. No. TXD-086278058

Site Operator Information:

Name of Company UNI REFINING INC.

Company's Address P.O. BOX 970

INGLESIDE, TEXAS 78362

Site Address INTERSECTION OF FM2725 AND BISHOP

County SAN PATRICIO

Type of Industry PETROLEUM REFINING

Indicate below Classes of Waste managed (Hazardous-H, Class I nonhazardous-NH, Class II-II).

Generator H, NH, II

Transporter

Small Quantity Generator

Yes ✓ No

Treatment H (?)

Storage NH

Disposal NH

SEE IOM

Site Information (T.S.D. facilities only)

1. Are facilities located outside the 100 year flood plain area?

Yes No ✓

2. Describe land use within one mile RESIDENTIAL, INDUSTRIAL

Inspection Information:

1. Inspectors Name & Title JOHN BOLDERS - ENV. QUAL. SPEC.
RUSSELL LEWIS - GEOLOGIST

Phone No (512) 882-2548

2. Inspection Date: FEBRUARY 9, 1982

3. Inspection Participants: RICH THOMPSON (REFINERY MGR) Phone No. (512) 776-2537

Approved

Paul Kutchinski
District Supervisor

Signed:

John Bolders
Inspector

Date:

2-25-82

Instructions for completing the Non-Major Compliance Monitoring Inspection Report (Solid Waste Generators)

This report is to be completed, and appropriate checklists are to be utilized in conjunction with inspection of hazardous waste on-site and off-site activities, Class I non-hazardous waste on-site and off-site activities, and Class II waste on-site industrial solid waste activities. This form is not intended for reporting of special problem type solid waste inspections involving non-registered or non-permitted activities.

When completing the inspection report form and checklist, please type or print clearly.

1. Class I nonhazardous and Class II generators with facilities for on-site disposal requires: this cover sheet, Generators and Facilities Checklist and separate (possibly multiple) Checklists for all individual facilities. These will only be partially completed, with page(s) deletion or leaving blank spaces for hazardous waste questions.
2. The Generators and Facilities Checklist and all individual facilities checklists should include adequate drawings or sketches annotated to present an understanding of location and which checklist concerns which solid waste management activity(s) (not necessary to include waste generation source in the process operations).
3. Class II generators with all off-site disposal activities should be reported by I.O.M. only.
4. Inspection of Transporter (no on-site storage or processing) activities should be reported by I.O.M. only.
5. Inspection of Class I hazardous generators with periodic and infrequent shipper status may be reported by I.O.M. only. (Off-site disposal) - Attach this Inspection Cover Sheet to I.O.M.

Compliance Monitoring Inspection Report - Checklist Index

Group I

Inspection Cover Sheet
Generators Checklist
Facilities Checklist
Comments Sheet

Group II

Landfill Checklist
Surface Impoundments Checklist

Group II contd.

Land Treatment Checklist
Tanks Checklist
Chemical Physical and Biological
Treatment Checklist
Waste Pile Checklist
Incinerators Checklist
Thermal Treatment Checklist
Comments Sheet

INDUSTRIAL SOLID WASTE

Non-Major
Compliance Monitoring Inspection Report
Generators and Facilities Checklist

Section A - Manifest (Rule 156.22.01.110b)

1. Is the generator required to use the TDWR manifest?
2. Is the manifest properly completed?

Yes ☒ No ☐
Yes ☒ No ☐

NOTE: If generator is a small quantity generator, manifesting is the only pretransport requirement.

Section B - Hazardous Waste Determination (Rule 156.22.01.106(a-f) & 156.22.06.002)

1. On a copy of the registration, note generated solid waste(s) listed in Part 261 Subpart D with L (listed) and solid waste(s) that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity) with C (characteristic).
2. If notification or disposition of waste stream changes is not current, explain in comments sheet.

SEE I.O.M.

Section C - Pretransport Requirements (Rule 156.22.06.005-.009)

1. Does generator appear to have standard procedures for packaging, labeling and marking of hazardous waste?
2. Accumulation Time - (May accumulate hazardous waste for up to 90 days without a permit provided).
 - a. If containers are used to temporarily store waste before transport, is each container clearly dated? Also, fill out rest of No. 2 (Accumulation Time)
 - b. Are containers inspected for leakage or corrosion at least weekly?
 - c. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line?

Yes ☒ No ☐

N/A Yes ☐ No ☐

N/A Yes ☐ No ☐

N/A Yes ☐ No ☐

- NOTE:
1. If tanks used, fill out checklist for tanks.
 2. If generator accumulates waste on-site for less than 90 days, (has no TSD facilities) complete only Section H, J and K after Section E of this Checklist. A small quantity generator is exempt from these requirements, including Section C above, and all others after Section E.

ATTACHED

Section D - Recordkeeping and Reports (Rule 156.22.01.109 156.22.06.010-.012)

1. Does generator keep the required records and reports for 3 years?

Yes ☒ No ☐

TDWR-

Page 3 of 5 (changed 1/4/82, Section A, B and E and Notes revised.

** (Indicates checklist questions which should be noted or completed at the time of an on-site inspection.)

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Section E - General Facility Standards

1. Has proof of deed recordation of on-site disposal facilities been provided to the agency?
2. Have there been any spills?
3. Have all spills been reported?

Yes _____ No ☒
Yes _____ No ☒
N/A Yes _____ No _____

SEE COMMENTS

Attached

NOTE: Attach a sketch of facilities. For all nonhazardous facilities do not complete the remainder of this Checklist. Use specific type facility checklists (from Group II form) and complete one checklist for each disposal facility.

Section F - Waste Analysis - Rule 156.22.08.004 and .08.005

1. Does facility have an adequate waste analysis plan?
2. Does the facility provide adequate security?
3. Does the facility have a sign with the legend "Danger-Unauthorized Personnel Keep Out? (unless exempt)?

Yes _____ No ☒
Yes ☒ No _____
Yes _____ No ☒

Section G - General Inspection Requirements - Rule 156.22.08.006

1. Does facility have an adequate written inspection schedule (and plan)?
2. Does the owner/operator maintain an inspection log?

Yes _____ No ☒
Yes ☒ No ☒

Section H - Personnel Training - Rule 156.11.08.007

1. Does the owner/operator maintain adequate Personnel Training Records at the facility?

Yes _____ No ☒

Section I - Requirements for Ignitable, Reactive or Incompatible Waste - Rule 156.22.08.008, Appendix IV of .05., and .15.002

1. Is the owner/operator familiar with proper separation and safeguards needed to prevent ignition or reaction of ignitable or reactive waste?
2. Inspect containers:
 - a. Has owner transferred waste from all containers leaking, bulging, or corroding?

N/A Yes _____ No _____

N/A Yes _____ No _____

Section J - Preparedness and Prevention - Rule 156.22.09.001-.007

1. Does the owner/operator have phone numbers of and agreements with police, fire departments, emergency response teams, emergency response contractors and equipment suppliers, as appropriate?
 - a. Are they readily available to the emergency coordinator?

Yes ☒ No _____

Yes ☒ No _____

Section K - Contingency Plan & Emergency Procedures - Rule 156.22.10.001-.007

1. Is an adequate contingency plan maintained at the facility?

Yes ☒ No _____

TDWR

Page 4 of 5 (Changed 1/4/82, Questions 2 and 3 of Section E.)

** See note, Page 3

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Section L - Manifest System, Recordkeeping and Reporting -

Rule 156.22.11.001-.007 and .13.001-.010

1. If facility receives waste from off-site, does the owner/operator comply with manifest requirements?
2. Does the owner/operator keep an adequate written operating record(s) at the facility?
3. Does the owner/operator maintain a closure plan for all facilities?
4. Does the owner/operator maintain a post closure plan for disposal facilities?

N/A Yes ☐ No ☐

Yes ☐ No ☒

Yes ☐ No ☒

N/A ~~Yes ☐~~ ~~No ☐~~

NOTE: If the answers to any of the proceeding questions is no, if it is not explained in the attached copy of the corrective action letter sent to the facility, explain it in the comments sheet.

Date 2-9-82

INDUSTRIAL SOLID WASTE

Reg./Permit No. 31288

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: E Paragraph: _____

Small quantities of API Separator sludge have been put
in a waste pile in the tank farm. The company was not
aware of the regulations and requirements pertinent to
this practice. The company will remove the small amount
deposited and ship all API sludges offsite in the future.

SECTION: All Paragraph: _____

Regulations pertaining to hazardous wastes may not
be applicable pending results of the tests on the
Spent caustic.

SECTION: _____ Paragraph: _____

INDUSTRIAL SOLID WASTE
Compliance Monitoring Inspection Report
Tanks Checklist (Rule 156.22.16.001-007)

1 tank waste oil

Class of Waste U/a.

Section A - General

1. Are tanks presently used to treat or store waste? Yes ☒ No ☐
a. If no, do not complete rest of form.
**b. If yes, check tanks. (Describe type of tank and indicate underground, above ground, or on-ground in comments sheet). on-ground
**c. Is there evidence that incompatible wastes have been placed in the tank? Yes ☐ No ☒
(1) If yes, explain in comments sheet.
**d. Is there evidence of any ruptures, leaks or corrosion of the tank(s)? Yes ☐ No ☒
(1) If yes, explain in comments sheet.
2. Are there any uncovered tanks? Yes ☐ No ☒
a. If no, do not complete - e.
**b. If yes, do they have 2 feet (60 cm) freeboard? N/A Yes ☐ No ☐
or
**c. A containment structure? (e.g. dike or trench) N/A Yes ☐ No ☐
or
**d. A drainage control system? N/A Yes ☐ No ☐
**e. A diversion structure? (e.g. standby tank)
(NOTE: The structure in c, d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank.) N/A Yes ☐ No ☐
3. Are any of the tanks continuous feed? Yes ☐ No ☒
**a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or bypass to a stand-by tank)? N/A Yes ☐ No ☐

Section B - Waste Analysis

1. Is the tank used to store one waste exclusively? Yes ☒ No ☐
a. If no, what are the different wastes stored in the tank?

TDWR

Page 9 of 20 of Group II

(Changed 6/2/81, added 1d and 1d(1))

** Note checklist questions to be noted or completed during on-site inspection

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b. Are waste analyses and treatment or storage tests done on these different wastes?

N/A Yes ☐ No ☐

(1) If no, does he have written, documented information on similar storage or treatment of similar wastes?

N/A Yes ☐ No ☐

c. Are there records available of these waste analyses in the operating record?

N/A Yes ☐ No ☐

Section C - Inspections

1. Do the records indicate the owner/operator inspects, where present, the following at least daily:

a. Discharge control equipment (e.g. waste feed cut-off, by pass and/or drainage system)?

Yes ☐ No ☒

b. Monitoring equipment (e.g. pressure and temperature gages)?

Yes ☐ No ☒

c. Level of waste in each uncovered tank?

Yes ☐ No ☒

2. Do the records indicate the owner/operator inspects the following at least weekly:

a. Construction materials of tanks for corrosion or leaks?

Yes ☐ No ☒

b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage?

Yes ☐ No ☒

3. Is there a written inspection schedule (Rule 156.22.08/006)?

Yes ☐ No ☒

a. If yes, is the schedule kept at the site?

Yes ☐ No ☒

b. If no for 3 or 3a, explain in the comments sheet.

4. Is there evidence of ignitable wastes placed in tanks?

Yes ☐ No ☒

a. If yes, do records indicate that they are treated, rendered, or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable? or

N/A Yes ☐ No ☐

**b. Is the waste protected from sources of ignition?

N/A Yes ☐ No ☐

(1) If yes, use comments sheet to describe separation and confinement procedures.

(2) If no, use comments sheet to describe sources of ignition. or

c. Is the tank used solely for emergencies?

Yes ☐ No ☒

TDWR- changed 11/6/81, (made 2 questions of No. 4, and 4a-c)

Page 10 of 20 of Group II

** See Note on page 9.

40010

(1) If yes, use comments sheet to describe separation and confinement procedures.

(2) If no, use comments sheet to describe sources of ignition or reaction.

or

c. Is the tank used solely for emergencies?

Yes ___ No ☒

5. Do the records indicate that incompatible wastes placed in the same tank?

Yes ___ No ☒

a. If yes, explain in the comments sheet.

6. If a waste is to be placed in a tank that previously held an incompatible waste do operating records indicate that the tank was washed?

N/A Yes ___ No ☒

a. If yes, describe washing procedures. _____

b. Describe how it is possible for incompatible waste to be placed in the same tank. _____

NOTE: If the answer to Section A 2b-e and 3a, Section B 1b(1) and 1c, and Section C 1a-c, 2a, and 2b was no, explain in comments sheet.

7. Describe tank(s) site and indicate plat map location(s) and designation(s). Also describe size and capacity of each tank: SEE ATTACHED MAP

TANK - 11 FT (DIAMETER) x 16 FT (HEIGHT)

- CAPACITY 12600 gallons

Checklist Tanks
(attach. to correct check)

Date 2-9-82

INDUSTRIAL SOLID WASTE

Reg./Permit No. 31288

Compliance Monitoring Inspection Report

COMMENTS SHEET

SECTION: C Paragraph: _____

No hazardous waste determination has been made. The
spent caustic was assumed to be hazardous until the company
can prove otherwise. No written inspection records were
available.